

SEALED

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

JUL 02 2024

Heidi D. Campbell, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHAD HENRY DAVIS,
a/k/a "gracefulbigly@gmail.com,"

Defendant.

Case No. 24 CR - 218 JFH

FILED UNDER SEAL

INDICTMENT

[COUNTS ONE through THREE:

18 U.S.C. §§ 1030(a)(2)(C) and

1030(c)(2)(B)(ii) – Obtaining

Information by Computer from a

Protected Computer;

COUNT FOUR: 18 U.S.C.

§§ 1029(a)(3) and 1029(c)(1)(A)(i) –

Possession of Fifteen or More

Unauthorized Access Devices;

COUNT FIVE: 18 U.S.C.

§§ 2252(a)(2) and 2252(b)(1) –

Receipt of Child Pornography;

COUNT SIX: 18 U.S.C.

§§ 2252(a)(4)(A) and 2252(b)(2) –

Possession of Child Pornography in

Indian Country;

COUNTS SEVEN and EIGHT: 18

U.S.C. § 1028A(a)(1) – Aggravated

Identity Theft;

Forfeiture Allegation: 18 U.S.C.

§§ 982(a)(2)(B), 1028(b),

1029(c)(1)(C), 1030(i) and 2253(a) –

Identity Theft, Child Exploitation

and Computer Crimes Forfeiture]

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. §§ 1030(a)(2)(C) and 1030(c)(2)(B)(ii)]

From on or about March 30, 2022, to on or about August 16, 2022, in the Northern District of Oklahoma, the defendant, **CHAD HENRY DAVIS**, a/k/a “gracefulbigly@gmail.com,” intentionally accessed a computer without authorization, and thereby obtained and attempted to obtain information belonging to S.M., a person known to the Grand Jury, from a protected computer and the offense was committed in furtherance of a criminal and tortious act in violation of the laws of the United States and the laws of Oklahoma, namely:

1. Possession of Child Pornography in Indian Country, as further described in Count Six of this Indictment;
2. Video Voyeurism, in violation of Title 18, United States Code, Section 1801(a); and
3. Invasion of Privacy by Intrusion Upon a Person’s Seclusion.

All in violation of Title 18, United States Code, Sections 1030(a)(2)(C) and 1030(c)(2)(B)(ii).

COUNT TWO
[18 U.S.C. §§ 1030(a)(2)(C) and 1030(c)(2)(B)(ii)]

From on or about October 21, 2021, to on or about August 16, 2022, in the Northern District of Oklahoma, the defendant, **CHAD HENRY DAVIS**, a/k/a “gracefulbigly@gmail.com,” intentionally accessed a computer without authorization, and thereby obtained and attempted to obtain information belonging to B.S., a person known to the Grand Jury, from a protected computer, and the offense was committed in furtherance of a criminal and tortious act in violation of the laws of the United States and the laws of Oklahoma, namely:

1. Video Voyeurism, in violation of Title 18, United States Code, Section 1801(a); and
2. Invasion of Privacy by Intrusion Upon a Person’s Seclusion.

All in violation of Title 18, United States Code, Sections 1030(a)(2)(C) and 1030(c)(2)(B)(ii).

COUNT THREE
[18 U.S.C. §§ 1030(a)(2)(C) and 1030(c)(2)(B)(ii)]

From on or about March 9, 2022, to on or about August 16, 2022, in the Northern District of Oklahoma, the defendant, **CHAD HENRY DAVIS**, a/k/a “gracefulbigly@gmail.com,” intentionally accessed a computer without authorization, and thereby obtained and attempted to obtain information belonging to A.J., a person known to the Grand Jury, from a protected computer, and the offense was committed in furtherance of a tortious act in violation of the laws of Oklahoma, namely: Invasion of Privacy by Intrusion Upon a Person’s Seclusion.

All in violation of Title 18, United States Code, Sections 1030(a)(2)(C) and 1030(c)(2)(B)(ii).

COUNT FOUR
[18 U.S.C. §§ 1029(a)(3) and 1029(c)(1)(A)(i)]

From in and around August 2021, to on or about August 16, 2022, in the Northern District of Oklahoma, the defendant, **CHAD HENRY DAVIS**, a/k/a “gracefulbigly@gmail.com,” knowingly and with intent to defraud, possessed affecting interstate and foreign commerce at least fifteen username and password pairs, which **DAVIS** knew were unauthorized access devices belonging to persons known and unknown to the Grand Jury.

All in violation of Title 18, United States Code, Sections 1029(a)(3) and 1029(c)(1)(A)(i).

COUNT FIVE
[18 U.S.C. §§ 2252(a)(2) and 2252(b)(1)]

From on or about March 30, 2022, to on or about August 16, 2022, in the Northern District of Oklahoma, the defendant, **CHAD HENRY DAVIS**, a/k/a “gracefulbigly@gmail.com,” knowingly received any visual depiction, using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce, by any means including by computer, the production of that visual depiction involved the use of a minor engaging in sexually explicit conduct, and the visual depiction is of that conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT SIX
[18 U.S.C. §§ 2252(a)(4)(A) and 2252(b)(2)]

From on or about March 30, 2022, to on or about August 16, 2022, within Indian Country in the Northern District of Oklahoma, the defendant, **CHAD HENRY DAVIS**, a/k/a “gracefulbigly@gmail.com,” knowingly possessed and accessed with intent to view any visual depiction, the production of that visual depiction involved the use of a minor engaging in sexually explicit conduct, that visual depiction was of that conduct, and that visual depiction involved at least one minor who had not attained 12 years of age engaging in sexually explicit conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(4)(A) and 2252(b)(2).

COUNT SEVEN
[18 U.S.C. § 1028A(a)(1)]

From on or about October 21, 2021, to on or about August 16, 2022, in the Northern District of Oklahoma, the defendant, **CHAD HENRY DAVIS**, a/k/a “gracefulbigly@gmail.com,” knowingly transferred, possessed, and used, without lawful authority, a means of identification of persons known to the Grand Jury, during and in relation to a felony enumerated in Title 18, United States Code, Section 1028A(c), namely, Obtaining Information by Computer from a Protected Computer, in violation of Title 18, United States Code, Sections 1030(a)(2)(C) and 1030(c)(2)(B)(ii), as set forth more fully in Counts One, Two, and Three of this Indictment, knowing that the means of identification belonged to real persons.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT EIGHT
[18 U.S.C. § 1028A(a)(1)]

From in and around August 2021, to on or about August 16, 2022, in the Northern District of Oklahoma, the defendant, **CHAD HENRY DAVIS**, a/k/a “gracefulbigly@gmail.com,” during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028(c), namely, Possession of At Least 15 Unauthorized Access Devices, in violation of Title 18, United States Code, Sections 1029(a)(3) and 1029(c)(1)(A)(i), as set forth more fully in Count Four of this Indictment, knowingly transferred, possessed, and used, without lawful authority, the means of identification of the following persons known to the Grand Jury:

1. A.M.;
2. W.H.;
3. M.G.;
4. D.C.;
5. D.H.;
6. J.P.;
7. M.S.;
8. S.B.;
9. S.S.;
10. S.F.;
11. M.R.; and
12. K.H.,

knowing that the means of identification belonged to real persons.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

FORFEITURE ALLEGATION

[18 U.S.C. §§ 982(a)(2)(B), 1028(b), 1029(c)(1)(C), 1030(i) and 2253(a)]

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(2)(B), Title 18, United States Code, Section 1028(b), Title 18, United States Code, Section 1029(c)(1)(C), Title 18, United States Code, Section 1030(i) and Title 18, United States Code, Sections 2253(a).

Upon conviction of the offenses alleged in this Indictment, as a part of his sentence, the defendant, **CHAD HENRY DAVIS** shall forfeit to the United States any property constituting, or derived from, or traceable to, the proceeds obtained, directly or indirectly, as a result of such violations and any property, real or personal, that was used or intended to be used to commit or to facilitate the violations of federal law. The property to be forfeited includes, but is not limited to:

ELECTRONICS

1. A black Republic of Gamers Desktop PC;
2. A white Republic of Gamers Desktop PC;
3. A blue Galaxy A12 Cell Phone S/N R58T207AJKM; and
4. A Razr Phone 2 S/N 181916V01501713.

All pursuant to Title 18, United States Code, Section 982(a)(2)(B), Title 18,
United States Code, Section 1028(b), Title 18, United States Code, Section
1029(c)(1)(C), Title 18, United States Code, Section 1030(i) and Title 18, United
States Code, Sections 2253(a).

CLINTON J. JOHNSON
United States Attorney

A TRUE BILL



GEORGE JIANG
Assistant United States Attorney

/s/ Grand Jury Foreperson
Grand Jury Foreperson